

The Minnesota Project

Strong Local Economies, Vibrant Communities, and a
Healthy Environment

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October 1, 2004

Bill Storm
Energy Facility Permitting
Minnesota Environmental Quality Board
658 Cedar St., Room 300
St. Paul, MN 55155

RE: Invenergy Environmental Assessment EQB Docket 04-85-PPS-Cannon Falls EC

Dear Mr. Storm:

Thank you for the opportunity to comment on the scope of the Environmental Assessment of the Invenergy gas fired power plant. The Minnesota Project would like to respectfully offer the following comments.

The State of Minnesota has established numerous policies and statutes, which create a broad framework setting for the priority for a steady expansion of renewable energy resources in the State. Based on this over all statutory framework, it is necessary for the EA to consider reasonable renewable alternatives to the proposed fuels for the project. The EA should consider the use of biofuels or fuel oil blended with biofuels in lieu of fuel oil as a back up fuel. Specifically, the EA should consider a back up fuel blended with 20%, 5% and 2% biodiesel respectively.

In the recently completed Mankato Energy Center Large Electric Generating Power Plant Docket that was heard before the PUC and the EQB, the Minnesota Project and the Minnesota Soybean Growers Association introduced substantial information about the viability and applicability of biodiesel blended with fuel oil for use in combustion turbines. The record established in that proceeding established that there are minimal economic or technical barriers to using biodiesel in a combustion turbine. The testimony of Calpine's project manager stated, "*there do not appear to be any technical reasons that biodiesel cannot be used in such application in blended form.*" (Direct Testimony of Kent J. Morton on Behalf of Mankato Energy Center, LLC, OAH Docket No. 6-2500-15869 - EQB Docket No. 04-76-PPS-Calpine, page 33). The EQB needs to continue to look at the most reasonable renewable alternatives that can be applied to this power plant.

Thank you for your consideration of these comments. Please advise me if there is additional information that you may need for assessing the biodiesel alternatives.

Sincerely,

Mark Lindquist
Energy Policy Specialist